

EXHIBIT B

Ashley Marucci

From: Sharon Houston <shouston@lawpga.com>
Sent: Thursday, August 18, 2016 11:43 AM
To: Ashley Marucci
Subject: RE: Box Hill Cases - Notice of Deposition and Subpoenas to Kim Brockmeyer and Barbara Wagner

Thank you,

Sharon L. Houston, Esquire (NJ, MD, DC)
Law Offices of Peter G. Angelos, P.C.
One Charles Center
100 N. Charles Street
Baltimore, MD 21201
Direct Line 410-649-8839
Toll Free 800-252-6622
Fax 410-649-2101
Shouston@lawpga.com

From: Ashley Marucci [mailto:marucci@ewmd.com]
Sent: Tuesday, August 16, 2016 11:23 AM
To: Sharon Houston
Cc: Patti Kasputys; Kelly L. Lozoskie; 'Harry Roth (HRoth@cprlaw.com)'; 'Michael Coren (mcoren@cprlaw.com)'; 'Barbara Driscoll (bdriscoll@cprlaw.com)'; 'Catherine Steiner'; 'gkirby@pklaw.com'; Scott Krause; Debora Trotz
Subject: RE: Box Hill Cases - Notice of Deposition and Subpoenas to Kim Brockmeyer and Barbara Wagner

Sharon,

We reviewed the attachment to the Amended Notice of Deposition *Duces Tecum* with Ms. Brockmeyer, and she does not personally possess any responsive documents. Accordingly, we wanted to give you the courtesy of providing notice in advance of the deposition on Friday that Ms. Brockmeyer does not have responsive documents to produce.

To the extent any responsive documents may exist, presumably they are in the possession of HCASC and/or Box Hill Surgery Center. Inasmuch as Ms. Brockmeyer is being deposed as a fact witness, and not a corporate designee, her personal knowledge and document production are limited.

Best,
Ashley

Ashley L. Marucci, Esquire
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From: Debora Trotz [<mailto:DTrotz@lawpga.com>]

Sent: Wednesday, July 27, 2016 5:16 PM

To: Ashley Marucci; Sharon Houston

Cc: Patti Kasputys; Kelly L. Lozoskie; 'Harry Roth (HRoth@cprlaw.com)'; 'Michael Coren (mcoren@cprlaw.com)'; 'Barbara Driscoll (bdriscoll@cprlaw.com)'; 'Catherine Steiner'; 'gkirby@pklaw.com'; Scott Krause

Subject: RE: Box Hill Cases - Notice of Deposition and Subpoenas to Kim Brockmeyer and Barbara Wagner

Please find attached the deposition notice for Kim Brockmeyer.

Debora Trotz

| 410.649-2125 | dtrotz@lawpga.com



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From: Ashley Marucci [<mailto:marucci@ewmd.com>]

Sent: Wednesday, July 27, 2016 4:58 PM

To: Sharon Houston

Cc: Patti Kasputys; Debora Trotz; Kelly L. Lozoskie; 'Harry Roth (HRoth@cprlaw.com)'; 'Michael Coren (mcoren@cprlaw.com)'; 'Barbara Driscoll (bdriscoll@cprlaw.com)'; 'Catherine Steiner'; 'gkirby@pklaw.com'; Scott Krause

Subject: RE: Box Hill Cases - Notice of Deposition and Subpoenas to Kim Brockmeyer and Barbara Wagner

Counsel,

Ms. Wagner is available for deposition on August 25th or 30th.

Best,
Ashley

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From: Sharon Houston [<mailto:shouston@lawpga.com>]

Sent: Tuesday, July 26, 2016 3:49 PM

To: Ashley Marucci